

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA	§	
ex. rel. Lisa Wheeler,	§	
	§	
Plaintiff,	§	
	§	
v.	§	NO. 5:13-CV-00004-HLH
	§	
UNION TREATMENT CENTERS, LLC;	§	
UNION TREATMENT CENTER – AUSTIN,	§	
LLC; UNION TREATMENT CENTER –	§	
KILLEEN, LLC; UNION TREATMENT	§	
CENTER – SAN ANTONIO, LLC; UNION	§	
TREATMENT CENTER – CORPUS	§	
CHRISTI, LLC; UTC MANAGEMENT,	§	
LLC; UTC PROVIDERS – AUSTIN, INC.;	§	
UTC PROVIDERS – KILLEEN, INC.; UTC	§	
PROVIDERS – SAN ANTONIO, INC.; UTC	§	
PROVIDERS – CORPUS CHRISTI, INC.;	§	
CREEKSIDE SURGICAL, PLLC;	§	
CREEKSIDE DIAGNOSTICS, LLC;	§	
CCM&D CONSULTING, LLC; GARRY	§	
CRAIGHEAD; CHRISTINE CRAIGHEAD	§	
	§	
Defendants.	§	

**JOINT UNOPPOSED MOTION TO EXTEND CERTAIN DEFENDANTS’
DEADLINE TO FILE RESPONSIVE PLEADINGS TO THE UNITED
STATES OF AMERICA’S COMPLAINT IN INTERVENTION**

Union Treatment Centers, LLC, Union Treatment Center – Austin, LLC, Union Treatment Center – Killeen, LLC, Union Treatment Center – San Antonio, LLC, Union Treatment Center – Corpus Christi, LLC, UTC Management, LLC, UTC Providers – Austin, Inc., UTC Providers – Killeen, Inc., UTC Providers – San Antonio, Inc., UTC Providers – Corpus Christi, Inc., CCM&D Consulting, LLC, Garry Craighead, and Christine Craighead (the “Defendants”) file this Unopposed Motion to Extend Certain Defendants’ Deadline to File

Responsive Pleadings to the United States of America's Complaint in Intervention (the "Motion"). In support of the Motion, Defendants respectfully show the Court as follows:

1. Defendants' deadline to file a responsive pleading to United States of America's Complaint in Intervention is currently November 20, 2015.

2. Defendants seek to extend their responsive pleading deadline until January 22, 2016. This Motion is not made for delay but to permit the orderly resolution of issues in this case.

3. Defendants have conferred with John LoCurto, counsel for the United States, and he agreed not to object.

For the forgoing reasons, Defendants request the Court extend the deadline for them to file a pleading in response to United States of America's Complaint in Intervention to January 22, 2016.

Respectfully submitted,

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By: /s/ Afton Dee Sands

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CCM&D AND GARRY CRAIGHEAD**

CHRISTINE CRAIGHEAD

/s/ Christine Craighead

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CERTIFICATE OF CONFERENCE

I certify that I conferred with John LoCurto, counsel for the United States of America, regarding this motion and he agreed not to object.

/s/ Afton Dee Sands

Afton Dee Sands

CERTIFICATE OF SERVICE

I certify that on November 19, 2015, the foregoing document was electronically filed with the clerk of the court for the United States District Court for the Western District of Texas using the electronic case filing system, which will send notification to the following attorneys of record:

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and via certified mail return receipt requested and email to the following:

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/s/ Afton Dee Sands
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